

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

THOMAS J. MCNAMARA,  
Plaintiff

v.

**Civil Action No. 04-10356-WGY**

MASSACHUSETTS WATER RESOURCES  
AUTHORITY, LEROY WALKER, PETER  
YARROSI, CAROLYN FIORE, VICTOR  
L'ESPERANCE and KAREN BAILEY,  
Individually and in their capacities as Agents  
of the Massachusetts Water Resources  
Authority,  
Defendants

---

**INITIAL DISCLOSURE OF THE PLAINTIFF**

**A. WITNESSES WITH DISCOVERABLE INFORMATION THAT THE PLAINTIFF  
MAY USE TO SUPPORT HIS CLAIM**

1. Thomas J. McNamara, 220 Smith Street, Lowell, MA 01851
2. Leroy Walker, 452 Truman Parkway, Milton, MA 02186
3. Peter Yarrosi, MWRA Employee
4. Carolyn Fiore, MWRA Employee
5. Victor L'Esperance, MWRA Employee
6. Karen Bailey, MWRA Employee
7. Kevin McManus, MWRA Employee
8. Kate Murray, MWRA Employee
9. Karen Gay-Valenti, MWRA Employee
10. Jonathan Barnes, MWRA Employee
11. William Lazaris, MWRA Employee
12. Janet Crowley, MWRA Employee
13. Margareth Jackson, MWRA Employee
14. James Murphy, MWRA Employee
15. Richard Trubiano, MWRA Employee
16. Lt. Arthur Boyle, Lowell Police Dept. (ret.)

**B. DOCUMENTS WHICH THE PLAINTIFF MAY USE TO SUPPORT HIS CLAIM**

- a. Reports, Transcripts, Exhibits and Materials from McNamara v. MWRA, OFCCP Complaint No. B990046.
- b. Documents Contained in the Personnel Files of the individual defendants;

- c. Documents generated by the Lowell Police Department in connection with seizure of Plaintiff's License to Carry Firearms;
- d. Materials related to the suspension of Plaintiff by the MWRA, including matters related thereto;
- e. Electronic mail and other electronic files saved, deleted or stored on the defendants' computer hard drives related to the plaintiff.
- f. Medical records of Plaintiff;
- g. Records relating to the Retirement of Plaintiff;
- h. Veteran's Administration Records of Plaintiff.

To the extent these materials are in the plaintiff's possession, they are available for review at the offices of the Plaintiff's Counsel at 133 Merrimack Street, Lowell, Massachusetts in the alternative, the Plaintiff will send all materials to a copying company of the Defendants' choice, at the Defendants' expense, for copying.

### **C. COMPUTATION OF DAMAGES**

The Plaintiff seeks compensatory and punitive damages as well as attorneys fees and costs from the Defendants as set forth in the Plaintiff's Complaint.

The Plaintiff agrees to seasonably supplement this disclosure during the course of discovery.

Respectfully submitted,

For the Plaintiff,

S/ Gary G. Nolan

Gary G. Nolan, Esq.

BBO # 634907

Nolan | Perroni, LLP

133 Merrimack Street

Lowell, MA 01852

(978) 454-3800